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May 14, 2014

**VIA ECF**

Honorable Judge Alison J. Nathan  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, New York 10007

Re: Jessica Labrie v. Courtney Love Cobain  
Civil Action No.: 13-Civ-1833

Dear Judge Nathan:

We represent plaintiff Jessica Labrie ("Plaintiff") in the above-referenced action against defendant Courtney Love Cobain ("Defendant") pending before Your Honor. In accordance with Your Honor's Order dated May 12, 2014, we are jointly submitting this letter describing the three additional issues identified in the Case Management Order to be discussed at the Initial Conference before Your Honor on May 16, 2014.

First, with regard to the confidentiality of documents, Plaintiff has documents in her possession containing sensitive information about the Defendant. Plaintiff intends to use these documents to corroborate her claims. Since the Plaintiff has already executed a confidentiality agreement in connection with her employment, the parties have agreed to submit a stipulation of confidentiality to protect Plaintiff's rights and Defendant's privacy.

Second, with regard to the retransfer of this action to California, Plaintiff originally filed this case in California state court. Defendant removed the case to federal court, and successfully transferred the case to New York, primarily based on her New York residence. Plaintiff believes that Defendant recently moved back to Los Angeles and that Defendant's nexus with New York is now nonexistent. Plaintiff intends to move to retransfer this case to California. Defendant denies relocating to California and argues that as a matter of law relocation of a party subsequent to commencement of an action is irrelevant, and therefore objects to a motion to retransfer.

Third, with regard to further amendment of the First Amended Complaint, Plaintiff anticipates amending the Amended Complaint to add additional parties. Plaintiff performed work for Defendant as an individual but also for Defendant's California-located businesses. Plaintiff intends to add these businesses as Defendants. Defendant objects to further amendments and argues Plaintiff is barred from further amendments pursuant to Your Honor's Rules and Practices. Defendant further believes such amendment would be futile and subject to immediate dismissal.

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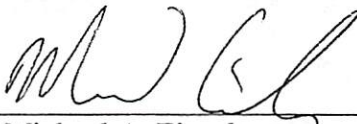
Thank you for your kind attention to this matter.

Respectfully submitted,

THE LAW OFFICE OF JOSH GRUENBERG

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